

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose
<i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i>
II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information
<p>Submitted by: = Northern Telephone & Data (NTD) Contact = Deanne Miller Telephone Number: (920)-426-9192 e-mail: info@ntd.net</p> <p>Subject Matter Expert (SME): Diane Burke Telephone Number: (920)-426-9192 e-mail: dburke@ntd.net</p> <p>Authorized Representative: William Miller Telephone Number: (920)-426-9192 e-mail: wmiller@ntd.net</p>
IV. Issue Identification
<p>Name: Application of Granted Credits Brief Description: SBC will grant claims and it will take over 90 days to appear on NTD's invoices.</p>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? This issue was first in January 2002 when NTD first started issuing dispute claims. 2. How many occurrences and approximately over how long a period of time?

- This occurs each month and has since NTD started disputing claims.
3. **Is it a recurring problem?** Yes
 4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, they don't see this as a problem.
 5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
 6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
 7. **Any other pertinent information?** Once claims are granted, they go off the dispute list. If credits are not received for 90 days, this dollar amount is considered owed.

VI. Prior Attempts to Resolve the Issue (*Please do not re-argue your case here or submit supporting documents.*)

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team .
2. **Was this issue escalated for dispute resolution? If so, when and in what forum? Last known position of the opposing carrier.** SBC does not see this as a problem.
3. **Were any bill adjustments made to resolve this issue?** NO
4. **Were any policies or procedures changed to address this issue? If so, what changes were made?** NO

VII. Relief Sought

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

VIII. Opposing Carrier's Response (*to be completed after July 30, 2003, prehearing*)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. **Your belief as to the cause of the problem.**
SBC believes that this problem, to the extent that it ever existed, has been corrected.
2. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.**
SBC does not believe this issue to involve an interpretation or application of law.
3. **What performance measures can be implemented to monitor the desired system operation?**
During the next six-month review SBC is proposing the following PMs in order to measure its performance in regard to the billing dispute and resolution process.

PM CLEC BLG-2 - Measures the percent of time that SBC Midwest acknowledges CLEC billing claims/disputes within 5 business days of receipt by SBC Midwest.

PM CLEC BLG-3 - Measures the percent of time that SBC Midwest sends claims

resolution notifications to the CLEC within 30 business days of receipt by SBC Midwest.

4. Any other pertinent information?

Prior to the end of July 2003, SBC had some claims for NTD that were past 90 days in process. Since that time, SBC has re-designed the claims group within the LSC and the processes that the claims group follows. SBC is proud to report the success of that effort. As of 08/26/2003, there are no open NTD claims older than 30 days that are pending in the LSC billing claims process. Of the ***5*** open claims that the LSC has before it from NTD on 08/26/2003, the average age of those claims is ***3.6*** days, the oldest of which is ***8*** days..

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact : *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Frederick C. Christensen*

Telephone Number: *(414)-319-5617*

e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*

Telephone Number: *214-464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

MN182795_1

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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II. Directions

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4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: = Northern Telephone & Data (NTD)
Contact = Deanne Miller
Telephone Number: (920)-426-9192
e-mail: info@ntd.net

Subject Matter Expert (SME): Diane Burke
Telephone Number: (920)-426-9192
e-mail: dburke@ntd.net

Authorized Representative: William Miller
Telephone Number: (920)-426-9192
e-mail: wmiller@ntd.net

IV. Issue Identification

Name: Changing of PONS

Brief Description: NTD submits an order with a PON (Purchase Order Number). SBC changes these PONs in numerous ways. One example of such a change is identifying PONs as CABSDAILY. The changes in PONs make it impossible to track and verify orders. All PONs are changed on our Facilities invoice.

V. Analysis of Issue

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in February, 2002. We discussed this problem with SBC in February, 2002 and submitted out first

claim on March 7, 2002.

2. **How many occurrences and approximately over how long a period of time?** NTD has experienced over 100 occurrences of this problem. This problem occurs on every Facilities bill and has been occurring on our UNE-P bills regularly.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, this problem is the result of representative's error and the lack of controls to avoid these errors.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?** It is nearly impossible to audit our Facilities bill because of this problem. The audit has been made unnecessarily difficult by SBC's actions.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. In fact, SBC has granted several of our claims regarding this problem, but SBC had not prevented the problem from recurring.
3. **Last known position of the opposing carrier.** SBC claims that this problem should be addressed by improving training of SBC personnel.
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** SBC has stated that they are attempting to improve the training of their representatives.

VII. Relief Sought

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
Manual service representative error.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *SBC does not believe this issue to involve an interpretation or application of law.*

3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information?

As noted in the Justin W. Brown reply affidavit filed on April 28, 2003(Docket 6720-TI-170, Petition of WI Bell Inc. for a Section 271 Checklist Proceeding) it appears that the problem may stem from an LSC manual process. The situation occurs when SBC systems handoff certain UNE-P orders to be handled manually. The system flags the order by changing the PON field to the identifier "CABSDAILY." The LSC service representative responsible for processing the order is directed to change the PON field back to the CLEC's original PON as part of the manual process.

Some service representatives had been failing to make the appropriate change, which resulted in the CLEC receiving the systemically changed PON on its bill. As with all manual process failures, the service representative teams are being, or have been covered on manual errors and methods and procedures (M&P) are being or have been reemphasized.

Additionally, the CABSDAILY PON assigned by the SBC Midwest systems is an indication of an order that was processed but not prompted by any current CLEC activity. That is, the current CLEC may see CABSDAILY appear on its CABS bill when that CLEC has lost an end user customer. The expectation is that the current CLEC would see CABSDAILY and a credit on its CABS bill under these circumstances.

In October of 2002, SBC Midwest's CABS system was modified to provide the CLEC PON within a remarks field on the Service Order ("SO") for facility-based orders. The CLEC does receive its SO number within the OCC section of their CABS bill. The CLEC also has the SO number and the PON from their Firm Order Confirmation ("FOC"). It is the CLEC's responsibility to build its system to compare the SO number from the FOC to the SO number from the CABS bill. That comparison provides the CLEC with the PON/SO relationship that NTD complains about. If NTD wishes to have this current process changed, it is NTD's responsibility to bring the issue to the Change Management Process (CMP) forum so that the issue can be fully shared and discussed with all participating CLECs, and a resolution arrived at that benefits all CLECs, not just NTD.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*

6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Fred Christensen*

Telephone Number: *(414) 319-5617*

e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*

Telephone Number: *(214) 464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: = Northern Telephone & Data (NTD)
Contact = Deanne Miller
Telephone Number: (920)-426-9192
e-mail: info@ntd.net

Subject Matter Expert (SME): Diane Burke
Telephone Number: (920)-426-9192
e-mail: dburke@ntd.net

Authorized Representative: William Miller
Telephone Number: (920)-426-9192
e-mail: wmiller@ntd.net

IV. Issue Identification

Name: Double billed for Lines

Brief Description: SBC bills the same line twice on the invoice.

V. Analysis of Issue

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in February, 2002. We discussed this problem with SBC in February, 2002 and submitted our first claim on March 27, 2002.
2. **How many occurrences and approximately over how long a period of time?** NTD has experienced over 50 occurrences of this problem. This problem has been

- occurring on our UNE-P bills regularly.
3. **Is it a recurring problem?** Yes
 4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, this problem is the result of representative's error and the lack of controls to avoid these errors.
 5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
 6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
 7. **Any other pertinent information?**

VI. Prior Attempts to Resolve the Issue (*Please do not re-argue your case here or submit supporting documents.*)

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. In fact, SBC has granted all of our claims regarding this problem, but SBC had not prevented the problem from recurring.
3. **Last known position of the opposing carrier.** SBC claims that this problem should be addressed by improving training of SBC personnel.
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** SBC has stated that they are attempting to improve the training of their representatives.

VII. Relief Sought

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

VIII. Opposing Carrier's Response (*to be completed after July 30, 2003, prehearing*)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. **Your belief as to the cause of the problem.**
This issue was raised during the confidential settlement discussions between SBC and NTD. As part of that investigation, SBC discovered that on the invoices that NTD submitted for examination, telephone numbers did appear multiple times due to a CABS reconciliation performed in January and February of 2003. SBC performed this reconciliation as a final step in converting over to CABS billing platform as described in CLEC Accessible Letters (CLECAM01-148, CLECAM01-163, CLECAM01-189, CLECAM01-236, CLECAM01-397 & CLECAM02-509).
2. **Does this issue involve an interpretation and/or application of law, contract or**

tariff? If so, please explain. *No.*

3. What performance measures can be implemented to monitor the desired system operation? *N/A*

4. Any other pertinent information?

SBC did find an isolated case of duplicate billing for a telephone number that was determined to be of human error. SBC reinforced the M&P with the service representative in question. In addition, NTD agreed to monitor this issue with SBC as part of the aforementioned investigation.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*

2. Were any bill adjustments made to resolve this issue?

No dollar adjustment was need in the aforementioned human error since NTD was being billed for a telephone number and the credit and debit zeroed out the amount owed. All adjustments due to CABS reconciliation have been made.

3. How were the adjustments communicated to the submitting carrier. Please attach any relevant accessible letter(s). ? *Matrix provided to NTD by SBC*

4. Identify any other carrier(s) known to have experienced similar problems. *N/A*

5. Did you identify any other problems arising from or related to this issue? *No.*

6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *See above.*

7. Were any policies or procedures changed to address this issue? If so, what changes were made? *No.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Liz Porto*

Telephone Number: *(312) 867-4350*

e-mail: *ep7827@sbc.com*

Authorized Representative: *Glen Sirles*

Telephone Number: *214-858-0700*

e-mail: *gs1066@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

MN182796_1

Investigation into the Wholesale Billing Practices of
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6720-TI-183

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3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

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Submitted by: = Northern Telephone & Data (NTD)
Contact = Deanne Miller
Telephone Number: (920)-426-9192
e-mail: info@ntd.net

Subject Matter Expert (SME): Diane Burke
Telephone Number: (920)-426-9192
e-mail: dburke@ntd.net

Authorized Representative: William Miller
Telephone Number: (920)-426-9192
e-mail: wmiller@ntd.net

IV. Issue Identification

Name: Escalation Process of Disputes

Brief Description: Disputes that are denied for a reason that NTD considers unjust are escalated. The process calls for these to go to the LCS Billing Manager. These claims have taken months to get responses on. Some escalations are directed to our account manger.

V. Analysis of Issue

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first in January 2002 when NTD first started issuing dispute claims.
2. **How many occurrences and approximately over how long a period of time?** This occurs each month and has since NTD started disputing claims.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, they don't see this as a problem.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?** 90 percent of denied claims get escalated. This is a huge amount of dollars.

VI. Prior Attempts to Resolve the Issue (*Please do not re-argue your case here or submit supporting documents.*)

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team .
2. **Was this issue escalated for dispute resolution? If so, when and in what forum? Last known position of the opposing carrier.** SBC does not see this as a problem.
3. **Were any bill adjustments made to resolve this issue?** NO
4. **Were any policies or procedures changed to address this issue? If so, what changes were made?** NO

VII. Relief Sought

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

VIII. Opposing Carrier's Response (*to be completed after July 30, 2003, prehearing*)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC does not believe that its LSC escalation process is too lengthy. Indeed, NTD, by its description of the process above, has not followed the process correctly.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
SBC does not believe this issue to involve an interpretation or application of law. However, all ICAs have dispute resolution provisions; it is incumbent upon all carriers to comply with the terms of their ICAs.
3. What performance measures can be implemented to monitor the desired system operation? *N/A*

4. Any other pertinent information?

NTD's description of the LSC escalation process is not completely accurate. As with other LSC ordering processes, should the CLEC at any time wish to escalate a billing issue to the LSC management team, it may do so by following the escalation process identified on the CLEC-specific escalation contact list available on the CLEC Online website. That escalation list provides the CLEC with the appropriate names and telephone numbers of the LSC Billing management team up to, and including, the Vice President of the SBC Midwest Local Operations team.

The escalation process has a target call back commitment time of two hours. CLECs are encouraged to contact the next level of management after that two-hour time frame expires if there has been no status provided. If NTD has escalated any issue to an LSC Line Manager and has not received a satisfactory answer to its inquiry, NTD should be contacting the next level of LSC management identified in the escalation list on the CLEC Online website. Given NTD's explanation above, it does not appear that it has been following the normal process.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

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Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Fred Christensen*

Telephone Number: *(414) 319-5617*

e-mail: *fc1618@sbc.com*

SBC Response to NTD-4

Authorized Representative: *Carla Rowland*
Telephone Number: *(214) 464-7511*
e-mail: *cb8043@sbc.com*

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XI. Final Disposition *(for staff use only)*

MN182899_1

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Telephone Number: (920)-426-9192
e-mail: dburke@ntd.net

Authorized Representative: William Miller
Telephone Number: (920)-426-9192
e-mail: wmiller@ntd.net

IV. Issue Identification

Name: Incorrect rates on contracted resale circuits.

Brief Description: When ordering a resale circuit, NTD must first submit a contract to SBC's contract department. This includes the circuit description, price and term plan. We are given a contract ID number which must be submitted on our order. SBC is not giving us the rated on our signed contract.

V. Analysis of Issue

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in June, 2002. We submitted our first claim on June 6, 2002.

SBC Response to NTD-5

2. **How many occurrences and approximately over how long a period of time?**
We have 10 circuits on our resale bill. All were charged the incorrect rate. We continue to be billed wrong.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, this problem is the result of representative's error and the lack of controls to avoid these errors. It is also because the correct rates are not being loaded into SBC's system.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?**
High priority.
7. **Any other pertinent information?** SBC credited NTD for three circuits, however, the pricing was never corrected. We continued to be billed the wrong rates.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. In fact, SBC has granted several of our claims regarding this problem, but SBC had not corrected the problem.
3. **Last known position of the opposing carrier.** SBC suggested that we submit new claims on all circuits that are not getting the correct rate and our account manager would make sure that the correct rates were built into the tables.
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** SBC has stated that they are attempting to improve the training of their representatives.

VII. Relief Sought

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. **Your belief as to the cause of the problem.**
There are two possible issues relating to these billing disputes:

NTD submits term contracts via a confirmation of service order which is an outdated process. A CLEC no longer needs to fill out a contract and submit it to

SBC's contract department. Instead, a CLEC may submit a resale circuit order via an LSR and denote the length of the term in the VTA Field (Variable Term Agreement). Following this process will generate an accurate bill. Attached below is the CLEC notice regarding the VTA Field:



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Settings\tml697\My I

Second, SBC believes the CLEC is not aware of the existing charges associated with their term agreement when additional services are riding a circuit. The term payment plan charges listed on the contract are included in the recurring charges. In addition, other types of recurring charges may be included depending on the type of circuit.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system operation? *SBC believes all billing inaccuracies will be resolved once the term agreements are submitted via an LSR with the VTA field populated.*
4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.

The following information was requested from NTD on August 7, 2003:

- *BTN's of the of the incorrect resale rate accounts*
- *Copies of the resale circuit contracts*
- *Copies of the conflicting resale rates on your bill*

2. Were any bill adjustments made to resolve this issue?

Per Account Management and Billing, several bill adjustments have been made in the past. However, NTD provided insufficient information to permit SBC to research the billing claims listed in this investigation.

3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).

The adjustments were communicated to NTD via phone conversations and written correspondence directly between the parties. An accessible letter was not issued.

4. Identify any other carrier(s) known to have experienced similar problems.

Currently, NTD is the only CLEC that requests term agreements with a confirmation of service agreement. NTD's use of this process may be the cause of the problem.

5. Did you identify any other problems arising from or related to this issue? *No.*

6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).

SBC remains willing to take several proactive steps to ensure complete, accurate, and timely billing of NTD circuit term agreements. These proactive steps include:

SBC Response to NTD-5

- *Creation of a core team to review disputed term rates. The core team will consist of product and account management, LSC billing and LSC provisioning. This review process is pending more detailed billing claims from NTD.*
 - *Reinforcement of the proper resale term agreement ordering process with NTD.*
 - *Verification of proper resale billing rates being applied in the billing system.*
7. *Were any policies or procedures changed to address this issue? If so, what changes were made? Additions to the CLEC Handbook to further explain the use of the VTA field on the LSR form.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Liz Porto*

Telephone Number: *(312) 867-4350*

e-mail: *ep7827@sbc.com*

Authorized Representative: *Glen Sirles*

Telephone Number: *(214) 858-0700*

e-mail: *gs1066@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: = Northern Telephone & Data (NTD)
Contact = Deanne Miller
Telephone Number: (920)-426-9192
e-mail: info@ntd.net

Subject Matter Expert (SME): Diane Burke
Telephone Number: (920)-426-9192
e-mail: dburke@ntd.net

Authorized Representative: William Miller
Telephone Number: (920)-426-9192
e-mail: wmiller@ntd.net

IV. Issue Identification

Name: Installation Charges
Brief Description: SBC is improperly assessing a \$40.10 install charge on lines that are being assumed. These lines should not be subject to an install charges.

V. Analysis of Issue

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in January 2002. NTD submitted its first claim on this issue on January 30, 2002, regarding problems on June 2001 invoices.

SBC Response to NTD-6

2. **How many occurrences and approximately over how long a period of time?**
There have been over 150 occurrences of this problem. This problem has been occurring since June 2001.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based upon our experience and discussions with SBC, this problem seems to be caused by fall out to a manual process, improperly trained SBC personnel, and lack of controls over SBC's manual process.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** No
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?**
High priority.
7. **Any other pertinent information?**

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes, this has been addressed in 3 meeting with SBC and NTD's account team and also discussed with the PUC.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? SBC grants the claims, however, they don't fix the problem.
3. Last known position of the opposing carrier. Training issue.
4. Were any bill adjustments made to resolve this issue? Yes, disputes were entered by NTD and granted by SBC.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? SBC stated that they re-trained their reps.

VII. Relief Sought

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
Manual service representative error.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
SBC does not believe this issue to involve an interpretation or application of law.
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information?
SBC Wisconsin acknowledges that there have been some manual errors made in regard to SEPUC USOC (Loop connection charge). The SEPUC USOC is

normally used when a CLEC is establishing an entirely new account. A new account is established by issuing a new ("N") type service order.

If a CLEC is migrating an end user from another UNE-P provider to its UNE-P service, the LSC must issue two service orders. One service order is used to disconnect ("D") the UNE-P line from the old CLEC's account and a new ("N") service order is used to establish the UNE-P line on the new CLEC's account. Some LSC service representatives initially misunderstood the migration process and mistakenly believed that all N orders required the SEPUC USOC, not realizing that, in the migration situation described above, the winning CLEC was not establishing a new service, but was migrating an existing end user from another CLEC. This situation was entirely the result of human error.

To the extent that errors occur, the LSC's claims process is in place to resolve these errors. As part of that process, SBC did perform a root cause analysis on the SEPUC issue, specifically for NTD. That analysis found that LSC service representative error was a minor contributor to the SEPUC charges that NTD received. In fact, the analysis indicated that LSC service representative error occurred only .58% of the time with regard to the application of the SEPUC USOC. Nevertheless, NTD should be encouraged once again to work collaboratively with the LSC Billing team to resolve any outstanding issues regarding the SEPUC USOC. SBC fully intends to work through any billing-related issues with any and all CLECs on a normal business-to-business basis to resolve such issues.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *See above.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *See above.*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

SBC Response to NTD-6

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Fred Christensen*

Telephone Number: *(414) 319-5617*

e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*

Telephone Number: *(214) 464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose <i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i>
II. Directions <ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information <p>Submitted by: = Northern Telephone & Data (NTD) Contact = Deanne Miller Telephone Number: (920)-426-9192 e-mail: info@ntd.net</p> <p>Subject Matter Expert (SME): Diane Burke Telephone Number: (920)-426-9192 e-mail: dburke@ntd.net</p> <p>Authorized Representative: William Miller Telephone Number: (920)-426-9192 e-mail: wmiller@ntd.net</p>
IV. Issue Identification <p>Name: Quantifying of Disputes Brief Description: Disputes that are denied and than re-opened or escalated, are not quantified in the dispute dollars open by NTD.</p>

V. Analysis of Issue

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in June, 2002. Our claim amount has never matched what SBC shows.
2. **How many occurrences and approximately over how long a period of time?** This occurs each month and has since NTD started disputing claims.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, they don't see this as a problem.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?** 90 percent of denied claims get escalated. This is a huge amount of dollars that is not being counted.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team .
2. **Was this issue escalated for dispute resolution? If so, when and in what forum? Last known position of the opposing carrier.** SBC does not see this as a problem.
3. **Were any bill adjustments made to resolve this issue?** NO
4. **Were any policies or procedures changed to address this issue? If so, what changes were made?** NO

VII. Relief Sought

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. **Your belief as to the cause of the problem.**
SBC believes that the amount that it has identified to NTD as being in the claims process is accurate.
2. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.**
SBC does not believe this issue to involve an interpretation or application of law.
3. **What performance measures can be implemented to monitor the desired system operation?** *N/A*
4. **Any other pertinent information?**
When a CLEC disagrees with the resolution of a claim, the appropriate procedure

is for the CLEC to reissue that claim with additional information supporting its position for reconsideration. When this process is followed, the dollars associated with that re-disputed claim are once again considered open disputes within SBC's claims tracking system.

Once SBC has resolved a claim (either in favor of the CLEC or in favor of SBC), the amounts are no longer considered to be in dispute. If the CLEC follows the process, documented on the CLEC Online website, and resubmits a previously rejected claim with subsequent supporting information, the amounts are once again considered to be in dispute. NTD does not provide enough information here for SBC to determine whether NTD has included the amounts that SBC has previously resolved, but that NTD has yet to resubmit with subsequent supporting data. If NTD is including the amounts of resolved claims that it has not resubmitted, then differing amounts are entirely possible.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *No.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact : *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Frederick C. Christensen*

Telephone Number: *(414)-319-5617*

e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*

Telephone Number: *214-464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition <i>(for staff use only)</i>

MN182903_1

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose
<i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i>
II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information
<p>Submitted by: = Northern Telephone & Data (NTD) Contact = Deanne Miller Telephone Number: (920)-426-9192 e-mail: info@ntd.net</p> <p>Subject Matter Expert (SME): Diane Burke Telephone Number: (920)-426-9192 e-mail: dburke@ntd.net</p> <p>Authorized Representative: William Miller Telephone Number: (920)-426-9192 e-mail: wmiller@ntd.net</p>
IV. Issue Identification
<p>Name: Converting single order to multiple orders. Brief Description: NTD submits an order to SBC. SBC will break the order up into two or three different orders and charge NTD an order processing charge for each order.</p>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? This issue was first discovered in July, 2002 and submitted out first claim on July 24, 2002. 2. How many occurrences and approximately over how long a period of time? NTD has experienced over 50 occurrences of this problem. This problem has been

occurring on our UNE-P bills regularly since it was discovered.

3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, this problem is the result of representative's error and the lack of controls to avoid these errors.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?**

VI. Prior Attempts to Resolve the Issue (*Please do not re-argue your case here or submit supporting documents.*)

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. In fact, SBC has granted all of our claims regarding this problem, but SBC had not prevented the problem from recurring.
3. **Last known position of the opposing carrier.** SBC claims that this problem should be addressed by improving training of SBC personnel.
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** SBC has stated that they are attempting to improve the training of their representatives.

VII. Relief Sought

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

VIII. Opposing Carrier's Response (*to be completed after July 30, 2003, prehearing*)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. **Your belief as to the cause of the problem.**
SBC believes that any occurrence of this issue is an anomaly that is related to manual service representative error.
2. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.**
SBC does not believe this issue to involve an interpretation or application of law.
3. **What performance measures can be implemented to monitor the desired system operation?** *N/A*
4. **Any other pertinent information?**
On occasion, a service representative will need to break a service order into

multiple parts. On those occasions, the service representative must manually waive the additional service order charges. SBC has released a procedural reminder reflecting the correct way to apply the service order charge in a multiple order scenario.

Nevertheless, it is important to note that the normal process to migrate an SBC retail POTS end user or a Resale end user to a CLEC's UNE-P service does not require that SBC issue multiple internal orders based on the single LSR received from the winning CLEC. Indeed, those two migrations are normally accomplished utilizing a single internal SBC service order.

The current SBC Wisconsin tariff calls for SBC to charge for three USOCs on POTS to UNE-P migration orders. The SEPUP USOC (Loop service order charge), the NR9UU USOC (Initial Port service order charge) and, in the case of residence service, the UJR USOC (Residence POTS ports charge). Each of these charges, SEPUP, NR9UU and UJR, are legitimate and the CLECs will continue to see these charges on their migration orders.

*SBC did conduct a sample examination of NTD's lines that required multiple service order charges. Of the 976 service orders examined, 12 were billed under multiple service orders of which none were improperly billed. SBC further examined over ***54,000*** NTD lines (representing ***4, 839*** PONs). 54 service orders (***.12***) needed an adjustment due to this issue. As of this response, all appropriate adjustments have been made to NTD for this anomaly.*

NTD has not provided a copy of any recent invoices that had any further problems of this nature. Nevertheless, SBC will gladly investigate and monitor any further examples that NTD may provide. In addition, SBC has again reinforced the Method and Procedure (M&P) document with the LSC Service Representatives regarding this issue.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *See above.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *See above.*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003,

<i>prehearing)</i>
<p>Submitted by: <i>SBC</i></p> <p>Contact : <i>James Jermain</i> Telephone Number: <i>608-252-2359</i> e-mail: <i>jj8571@sbc.com</i></p> <p>Subject Matter Expert (SME): <i>Frederick C. Christensen</i> Telephone Number: <i>(414)-319-5617</i> e-mail: <i>fc1618@sbc.com</i></p> <p>Authorized Representative: <i>Carla Rowland</i> Telephone Number: <i>214-464-7511</i> e-mail: <i>cb8043@sbc.com</i></p>
X. Further Investigative Activities <i>(for staff use only)</i>
XI. Final Disposition <i>(for staff use only)</i>

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose <p><i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i></p>
II. Directions <ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information <p>Submitted by: = Northern Telephone & Data (NTD) Contact = Deanne Miller Telephone Number: (920)-426-9192 e-mail: info@ntd.net</p> <p>Subject Matter Expert (SME): Diane Burke Telephone Number: (920)-426-9192 e-mail: dburke@ntd.net</p> <p>Authorized Representative: William Miller Telephone Number: (920)-426-9192 e-mail: wmiller@ntd.net</p>
IV. Issue Identification <p>Name: Backbilling for services. Brief Description: NTD has been billed for services that are any where from six months to over one year old. When we ask for an explanation of these charges, we are given none. When we dispute these charges, asking for specific details, the claims are denied. This happens with credits also.</p>
V. Analysis of Issue <p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? This issue was first discovered in October, 2002. We submitted our first claim on 10/9/2002.

2. **How many occurrences and approximately over how long a period of time?** NTD has experienced over 5 claims since October 2002.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Poor auditing and billing practices.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?** Our July 2003 invoice contained a credit. When NTD asked for the details regarding these credits, we were told it is impossible to get.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. In fact, SBC has granted several of our claims regarding this problem, but SBC had not prevented the problem from recurring.
3. **Last known position of the opposing carrier.** Unknown
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** Unknown

VII. Relief Sought

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. **Your belief as to the cause of the problem.**
SBC has no reason to believe that billing dispute resolution information has not been sent to NTD, nor does SBC believe that it arbitrarily denies NTD claims without providing NTD with the resolution (explanation).
2. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.**
SBC does not believe this issue to involve an interpretation or application of law.
3. **What performance measures can be implemented to monitor the desired system operation?**
During the next six-month review SBC is proposing the following PMs in order to measure its performance in regard to the billing dispute and resolution process.

PM CLEC BLG-2 - Measures the percent of time that SBC Midwest acknowledges CLEC billing claims/disputes within 5 business days of receipt by SBC Midwest.

PM CLEC BLG-3 - Measures the percent of time that SBC Midwest sends claims resolution notifications to the CLEC within 30 business days of receipt by SBC Midwest.

4. Any other pertinent information?

Without the specifics (claim numbers) on NTD's statement above, this response is limited in scope. There may have been back billing, the causes of which may differ by situation. Human error that has now been corrected via coaching may have occurred during the provisioning of an NTD order.

While working with NTD via a Matrix, there have been some adjustments made. In July 2003, an adjustment of \$1,371.05 for OS/DA will appear on NTD's July invoice. SBC will be happy to investigate further if NTD will provide additional information to the Billing Claims group.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
The Midwest LSC is current on all of NTD's claims.
2. Were any bill adjustments made to resolve this issue? *See above.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *See above.*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *See above.*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact : *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Frederick C. Christensen*

Telephone Number: *(414)-319-5617*

e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*

Telephone Number: 214-464-7511
e-mail: cb8043@sbc.com

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

MN182906_1

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: = Northern Telephone & Data (NTD)
Contact = Deanne Miller
Telephone Number: (920)-426-9192
e-mail: info@ntd.net

Subject Matter Expert (SME): Diane Burke
Telephone Number: (920)-426-9192
e-mail: dburke@ntd.net

Authorized Representative: William Miller
Telephone Number: (920)-426-9192
e-mail: wmiller@ntd.net

IV. Issue Identification

Name: Not getting correct interconnection rates
Brief Description: NTD has not gotten the correct trip charge rate on our facilities invoice, even though it was brought to SBC's attention over one year ago.

V. Analysis of Issue

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in June, 2002.
2. **How many occurrences and approximately over how long a period of time?**
 NTD has experienced over 100 occurrences of this problem. This problem occurs on every Facilities bill and had originally occurred on our UNE-P bills.

3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, this problem is the result of tables not being updated.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?** Not one of our facilities bills is correct. We made SBC aware that the charges should be \$51.00, not \$71.00. Each month, NTD must submit a dispute to get the contracted rates. Each month we incur late payment charges on this invoice, even though the invoice has never been correct.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. In fact, SBC has granted all of our claims regarding this problem, but SBC had not prevented the problem from recurring.
3. **Last known position of the opposing carrier.** SBC claims that this problem should be corrected. It has not to date.
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** Unknown.

VII. Relief Sought

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. **Your belief as to the cause of the problem.**
NTD was receiving the incorrect rate for trip charge on their facilities invoice because it did not have a loop class of service codes assigned to it.
2. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** *N/A*
3. **What performance measures can be implemented to monitor the desired system operation?** *N/A*
4. **Any other pertinent information?**
The CABS billing system was updated on July 7, 2003, to correct this error. Any service orders processed after July 7th are being rated at the \$51.00 rate. NTD

should have seen the correct rate appearing on their August 1, 2003 facilities' invoice for service orders processed after July 7th.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
SBC Midwest believes that it has resolved this issue for NTD.
2. Were any bill adjustments made to resolve this issue?
Yes, adjustments were made. NTD was notified of the adjustments to anticipate in its next billing cycle.
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
An accessible letter was not issued.
4. Identify any other carrier(s) known to have experienced similar problems. *No.*
5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *James Jermain*

Telephone Number: *608-252-2359*

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Subject Matter Expert (SME): *Sharmaine Summerville*

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Authorized Representative: *Glen Sirles*

Telephone Number: *214-858-0700*

e-mail: *gs1066@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: = Northern Telephone & Data (NTD)
Contact = Deanne Miller
Telephone Number: (920)-426-9192
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Subject Matter Expert (SME): Diane Burke
Telephone Number: (920)-426-9192
e-mail: dburke@ntd.net

Authorized Representative: William Miller
Telephone Number: (920)-426-9192
e-mail: wmiller@ntd.net

IV. Issue Identification

Name: Toll Charges from SBC
Brief Description: NTD receives toll charges from SBC each month on lines that have someone other than SBC as the PIC.

V. Analysis of Issue

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in June, 2002. We submitted our first claim on June 25, 2002.
2. **How many occurrences and approximately over how long a period of time?** NTD has experienced over 50 occurrences of this problem. This problem occurs on every

resale invoice and has been occurring on our UNE-P bills resently.

3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, this problem is the result of representative's error and the lack of controls to avoid these errors.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?** It has taken until August 2003 for these problems to be addressed, even though we have brought this issue up many times.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. NTD meet with SBC representatives specifically about this issue in November 2002. After the meeting, NTD was told it would be looked into.
3. **Last known position of the opposing carrier.** SBC admitted to a few errors and told NTD they would be corrected.
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** Unknown.

VII. Relief Sought

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. **Your belief as to the cause of the problem.**
SBC's investigation of this issue on behalf of NTD revealed that the majority of the toll-related charges NTD questioned were related to Directory Assistance Call Completion activity. That is, an NTD UNE-P end user dialed Directory Assistance (which is handled for NTD by SBC in Wisconsin) and requested that the call be completed automatically. This is normal call processing and is not a billing problem. The end user should receive a charge for the call completion that would appear as an SBC charge.

The remaining toll charges, identified by NTD as problematic, were related to the

*incorrect assignment of an end user's intralata PIC. According to the issues log used during the collaborative discussions held between SBC Midwest and NTD, this situation impacted ***8*** lines. According to the log, all such errors were corrected as of July 17, 2003, and the appropriate credits were to be issued for the few lines in question.*

*It appears that the ***8*** lines in question were the result of manual error on behalf of an LSC service representative. That is, while processing an order manually, an LSC service representative did not assign the appropriate intralata PIC to the end user. That, in turn, would have caused all intralata toll traffic originated from the ***8*** lines to be processed by SBC rather than the end user's carrier of choice. SBC has already taken the appropriate steps of investigating the claim, determining the appropriate outcome and crediting NTD's accounts as warranted.*

Additionally, Service Order accuracy is emphasized within the LSC with all LSC service representatives and the appropriate team and individual coaching does occur. While some manual error is unavoidable, given the very low number of occurrences noted above, it would appear that the SBC LSC's assignment of an incorrect intralata PIC does not occur very often.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
SBC does not believe this issue to involve an interpretation or application of law.
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
NTD agreed to put the issue into a monitor status per the collaborative NTD issues log.
2. Were any bill adjustments made to resolve this issue?
To satisfy NTD's claim, SBC will provide credit on switched access usage for the 5 months minus the C order credit on NTD's RBS bill. SBC will provide a credit of \$1,324 on the next applicable bill cycle (\$33.10 x 5 months x 8 lines).
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
Via the collaborative log and discussions with NTD during collaborative sessions.
4. Identify any other carrier(s) known to have experienced similar problems.
Unknown.
5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *No.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact : *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Frederick C. Christensen*

Telephone Number: *(414)-319-5617*

e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*

Telephone Number: *214-464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*